

HONORABLE CHRISTOPHER M. ALSTON
Chapter 11
Hearing Date: November 14, 2024
Time: 9:30 a.m.
Response Date: November 7, 2024
Hearing Location: Seattle Federal Courthouse
700 Stewart Street, 7th Floor
Courtroom 7206

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

B-1208 PINE, LLC,

Debtor.

Case No. 24-10088-CMA

**DECLARATION OF DEBORAH A.
CRABBE IN CONNECTION WITH
FILING PIVOT APARTMENT
LENDER, LLC'S REDLINE VERSION
OF AMENDED DISCLOSURE
STATEMENT FOR PIVOT
APARTMENT LENDER LLC'S
AMENDED PLAN OF LIQUIDATION
FOR THE DEBTOR**

DEBORAH A. CRABBE declares as follows:

1. I am an attorney at Foster Garvey P.C. and bankruptcy counsel to Pivot Apartment Lender, LLC ("Pivot"). I have personal knowledge of the facts set forth herein.

2. On behalf of Pivot, I filed Pivot Apartment Lender's First Amended Disclosure Statement for Pivot's Amended Plan of Liquidation (ECF No. 211) (the "First Amended Disclosure Statement").

3. Attached hereto as **Exhibit 1** is a redline version of the First Amended Disclosure Statement with redline versions of **Exhibit A** (Bid Procedures) and **Exhibit B** (Ballot), marked to show all changes from Pivot Apartment Lender LLC's Disclosure Statement for Pivot Apartment Lender, LLC's Plan of Liquidation for the Debtor filed at ECF No. 180 as compared to Pivot Apartment Lender's First Amended Disclosure Statement at ECF No. 211.

DECLARATION- 1

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4. The marked changes are all of changes made since Pivot's original Disclosure Statement at ECF 180 was filed on October 10, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED THIS 19th day of November, 2024.

/s/ Deborah A. Crabbe

Deborah A. Crabbe